

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: LOWER MANHATTAN DISASTER SITE
LITIGATION

-----X 07CV1700 (AKH)

MIQUEL SANTANA,

Plaintiffs,

ANSWER TO
AMENDED COMPLAINT

against .

100 CHURCH, LLC, 222 BROADWAY, LLC, 90
CHURCH STREET LIMITED PARTNERSHIP,
ALAN KASMAN DBA KASCO, AMBIENT
GROUP, INC., ANN TAYLOR STORES
CORPORATION, BATTERY PARK CITY
AUTHORITY, BELFOR USA GROUP, INC.,
BLACKMON-MOORING-STEAMATIC
CATASTROPHE, INC. D/B/ABMS CAT, BOARD
OF EDUCATION OF THE CITY OF NEW
YORK, BOARD OF MANAGERS OF THE
HUDSON VIEW EAST CONDOMINIUM,
BOSTON PROPERTIES, INC., BROOKFIELD
FINANCIAL PROPERTIES, INC., BROOKFIELD
FINANCIAL PROPERTIES, LP, BROOKFIELD
PARTNERS, UP, BROOKFIELD PROPERTIES
CORPORATION, BROOKFIELD PROPERTIES
HOLDINGS INC., CHASE MANHATTAN BANK
CORPORATION, CUNNINGHAM DUCT
CLEANING CO., INC., CUSHMAN &
WAKEFIELD, INC., DEPARTMENT OF
BUSINESS SERVICES, ENVIROTECH CLEAN
AIR, NC., GPS ENVIRONMENTAL
CONSULTANTS, INC., GRUBB & ELLIS
MANAGEMENT SERVICES, HILLMAN
ENVIRONMENTAL GROUP, LLC., HUDSON
VIEW EAST CONDOMINIUM, HUDSON VIEW
TOWERS ASSOCIATES, INDOOR AIR
PROFESSIONALS, INC., INDOOR
ENVIRONMENTAL TECHNOLOGY, INC.,
KASCO RESTORATION SERVICES CO., LAW
ENGINEERING P.C., MERRILL LYNCH & CO,
INC., MOODY'S HOLDINGS, INC., NEW YORK
CITY SCHOOL CONSTRUCTION AUTHORITY,
NOMIURA HOLDING AMERICA, INC.,
NOMURA SECURITIES INTERNATIONAL,
INC., R Y MANAGEMENT CO., INC., ROYAL
AND SUNALLIANCE INSURANCE GROUP,
PLC, RY MANAGEMENT, STRUCTURE TONE

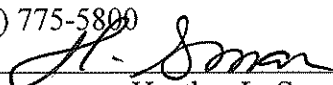
(UK), INC., STRUCTURE TONE GLOBAL
SERVICES, INC., SWISS BANK
CORPORATION, TOSCORP INC., TRC
ENGINEERS, INC., TRIBECA LANDING L.L.C.,
WESTON SOLUTIONS, INC., WFP TOWER B
CO. G.P. CORP., WFP TOWER B HOLDING CO.,
LP, WFP TOWER B. CO., L.P., WFP TOWER D
CO. G.P. CORP., WFP TOWER D HOLDING CO.
I L.P., WFP TOWER D HOLDING CO. II L.P.,
WFP TOWER D HOLDING I G.P. CORP., WFP
TOWER D. CO., L.P., AND ZAR REALTY
MANAGEMENT CORP., ET AL

Defendants.

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PLEASE TAKE NOTICE that defendant Envirotech Clean Air Inc. ("Envirotech"), as
and for their responses to the allegations set forth in the Amended Complaint by Adoption
("Check-off Complaint") related to the Master Complaint filed in the above-referenced action,
hereby adopts Envirotech's Answer to the Master Complaint dated August 3, 2007, which was
filed in the matter of *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21
MC 102 (AKH).

WHEREFORE, the defendant Envirotech demands judgment dismissing the above-
captioned action as against each of them, together with costs and disbursements.

Dated: Lake Success, New York
March 17, 2008

Yours, etc.
FRIEDMAN, HARFENIST, LANGER & KRAUT
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BY: 
Heather L. Smar (4622)